

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE

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JAMES M. BAKER, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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ROCHELLE PHILLIPS, On Behalf of  
Herself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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ROBERT WILKINS, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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LEONARD BRONSTEIN, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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Case No. 1:05-cv-00289-GMS

CLASS ACTION

GREGG PENN, On Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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Case No. 1:05-cv-00293-GMS

CLASS ACTION

CLIFFORD W. JONES, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

MBNA CORP., *et al.*,

Defendants.

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Case No. 1:05-cv-00316-GMS

CLASS ACTION

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|---|---|----------------------------|
| MICHAEL D. BLUM, On Behalf of Himself<br>and All Others Similarly Situated, | : |                            |
|   | : | Case No. 1:05-cv-00372-GMS |
| Plaintiff,  | : |                            |
| v.  | : | <u>CLASS ACTION</u>        |
| MBNA CORP., <i>et al.</i> ,   | : |                            |
| Defendants.   | : |                            |

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**STIPULATION AND ORDER**

**WHEREAS** putative class member Activist Investmentgesellschaft mbH for account of the PT-Master fund, represented by the law firm of Milberg Weiss Bershad & Schulman LLP, has filed a motion for consolidation of the above-referenced actions, for appointment as Lead Plaintiff and for approval of selection of Lead Counsel, and

**WHEREAS** said motion is unopposed as of the date below,

**IT IS HEREBY STIPULATED AND AGREED**, by and between

undersigned counsel for the parties herein and subject to the Order of this Court, that

(i) Lead Plaintiff will serve a consolidated amended complaint no later than 60 days after a decision is entered on the pending motions for appointment of Lead Plaintiff and approval of Lead Counsel, (ii) Defendants' answers to or motions to dismiss the consolidated amended complaint will be served no later than 60 days after the consolidated amended complaint is served, (iii) in the event that a motion to dismiss is made by one or more Defendants, Lead Plaintiff will have 60 days to file its answering

brief in response to such motion to dismiss and the moving Defendant or Defendants will have 45 days to submit their reply.

September 12, 2005

Richard J. Morse  
Richard H. Morse (I.D. No. 531)  
YOUNG, CONAWAY, STARGATT &  
TAYLOR, LLP  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, DE 19801  
(302) 571-6000  
[rmorse@ycst.com](mailto:rmorse@ycst.com)

Richard J. Urowsky  
Richard C. Pepperman, II  
SULLIVAN & CROMWELL LLP  
125 Broad Street  
New York, New York 10004  
(212) 558-4000

*Attorneys for Defendants*

Seth D. Rigrodsky  
Seth D. Rigrodsky (I.D. No. 3147)  
Ralph Sianni (I.D. No. 4151)  
MILBERG WEISS BERSHAD & SCHULMAN LLP  
919 N. Market Street, Suite 411  
Wilmington, Delaware 19801  
[rsianni@milbergweiss.com](mailto:rsianni@milbergweiss.com)  
[srigrodsky@milbergweiss.com](mailto:srigrodsky@milbergweiss.com)

Steven G. Schulman  
Peter E. Seidman  
Deborah M. Sturman  
Andrei V. Rado  
MILBERG WEISS BERSHAD & SCHULMAN LLP  
One Pennsylvania Plaza -- 49th Floor  
New York, NY 10119  
(212) 868-1229

*Attorneys for Plaintiffs Rochelle Phillips and Clifford W. Jones  
and Proposed Lead Plaintiff Activist Investmentgesellschaft mbH*



Joseph A. Rosenthal (I.D. No. 234)  
Jeffrey S. Goddess (I.D. No. 630)  
ROSENTHAL, MONHAIT, GROSS & GODDESS  
Mellon Bank Center, Suite 1401  
P. O. Box 1070  
Wilmington, DE 19899-1070  
[jgoddess@rmgglaw.com](mailto:jgoddess@rmgglaw.com)

*Attorneys for Plaintiffs James M. Baker, Leonard Bronstein, Robert Wilkins, Greg Penn,  
and Michael D. Blum*

SO ORDERED, this \_\_\_\_ day of September, 2005

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United States District Judge